

April 10, 2019

Magistrate Judge Vera M. Scanlon
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: USA v. Raniere et al | 1:18-cr-00204-NGG-VMS

Dear Judge Scanlon:

Please accept this letter pursuant to your order dated April 8, 2019 (Dkt. 512) regarding the Protective Order and 8 Hale Drive. Per the Court's request, and after reviewing the Protective Order, we have conferred with AUSA Jones. We shared our concerns with some of the restrictions in the Protective Order that are likely not necessary for the category of documents I would receive and the challenges several of these limitations would have on an efficient review and decision regarding privilege claims.

Based on the points we raised, the Government has agreed to provide directly to our Firm (or through defense counsel), documents related to my Clients, that have been segregated by the Taint Team based on search terms, as potentially my Clients privilege. I have agreed on behalf of our Clients to not share these documents with anyone, except people identified in the following fields: (1) to, from, or cc on the document, (2) the creator of the product, (3) the attorneys or firms mentioned in the communication, (4) employees and members of my Firm, or (5) my clients. Should I need to share these documents with anyone else, before I do so I will seek either permission from the Government or authorization from this Honorable Court.

If you have any questions or require further clarification regarding this letter, please do not hesitate to contact me.

Sincerely,

/s/ Michael J. Sullivan
Michael J. Sullivan